

SANDLER, REIFF, YOUNG & LAMB, P.C.

March 5, 2014

Jeff S. Jordan, Esq.
Supervisory Attorney
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: **MUR 6775, Respondents Ready for Hillary PAC and
Amy Wills Gray, in her official capacity as treasurer**

Dear Mr. Jordan:

I am writing on behalf of Ready for Hillary PAC and Amy Wills Gray, in her official capacity as treasurer, in response to a complaint submitted by attorney Christina P. Sirois on behalf of Stop Hillary PAC.

I. Summary

This complaint is based on Attorney Sirois's false legal representation that when a principal campaign committee of a former candidate simply rents its email list to a Federal political committee that has the effect of turning the former candidate into a "candidate" and the Federal political committee that rented the list into an "authorized committee" of the candidate under 2 U.S.C. §§ 431(2), (6), and 432(e)(1) of the Federal Election Campaign Act of 1971, as amended ("FECA"). There is no legal basis to support Attorney Sirois's representation of the law.

For there to be an "authorized committee" there must first be a candidate and a principal campaign committee. Then a candidate may only designate a political committee as an "authorized committee" if it does so in writing. 2 U.S.C. § 431(e)(1). Former Secretary of State Hillary Clinton is not a candidate for any office. Friends of Hillary is a former-candidate committee. Ready for Hillary PAC has not been authorized by any candidate to raise any contributions or make any expenditures on behalf of a candidate.

Ready for Hillary PAC simply rented an email list for a one-time use for the usual and normal charge in full compliance with FECA and decades of Commission holdings on this specific issue.

Attorney Sirois and her co-counsel Dan Backer are not making a clever new legal argument. They are abusing the Commission's complaint system by making false representations of the law to generate press and raise funds for the Stop Hillary PAC. A legal argument based on a knowingly false representation of law constitutes dishonesty to the Federal Election Commission. We respectfully request that the Commission dismiss this complaint and report Christina Sirois and Dan Backer's misconduct to the Virginia State Bar Association.

II. Factual and Legal Analysis

A. Statement of Facts

Ready for Hillary PAC is an independent-expenditure-only Federal political committee registered with the Commission on January 25, 2013.¹ It raises contributions and makes expenditures independently from any candidate, candidate's committee, or political committee. Ready for Hillary PAC is publicly and independently encouraging former Secretary of State Hillary Clinton to run for president.

According to Commission records, Friends of Hillary was the principal campaign committee for Hillary Rodham Clinton when she was a 2006 candidate for the U.S. Senate in New York. The last time she was a candidate for any office was in 2008 when she ran for president. Her principal campaign committee was Hillary Clinton for President. Termination of the presidential campaign committee was approved by the Commission in 2013. Former Secretary of State Clinton is not a candidate for office at this time, according to Commission records.

In December 2013, Ready for Hillary PAC entered into a license agreement with Friends of Hillary for the one-time use of the Friends of Hillary email list. On January 3, 2014, Ready for Hillary PAC sent an email to the Friends of Hillary email list (the "Bumper Sticker Email").² The Bumper Sticker Email encouraged recipients to click on links that took them to a landing page on the Ready for Hillary PAC website where individuals could request a free Ready for Hillary bumper sticker.³

1. Ready for Hillary PAC paid the usual and normal charge to rent the email list.

Ready for Hillary PAC understands that Friends of Hillary regularly rents its email list to other entities, including Federal political committees, for a usual and normal charge, fair market value through a commercial list brokerage firm. In December 2013, Ready for Hillary PAC, in an arms-length transaction, agreed to pay a license fee of \$136,841.70 for a one-time use of the Friends of Hillary email list.

2. Standard industry practice was followed by the list brokerage firm in handling the use of the rented email list

Trilogy Interactive, LLC, the list brokerage firm for Friends of Hillary, handled all aspects of the transaction for Ready for Hillary PAC including collecting the payment and the actual sending of the Bumper Sticker Email to the email list.

Ready for Hillary PAC understands that the standard industry practice for the

¹ 2 U.S.C. § 433; *SpeechNow.org v. FEC*, 599 F.3d 686 (D.C. Cir. 2010); FEC AQ 2010-11.

² Ready for Hillary PAC, "Free Hillary Clinton Bumper Sticker" (Jan. 3, 2014) attached as Exhibit 1.

³ Ready for Hillary PAC, "Free Ready for Hillary Bumper Sticker!" web page attached as Exhibit 2.

commercial marketing of a rented email list was followed by the list brokerage firm. Specifically, Ready for Hillary PAC understands that it is the list brokerage firm's standard practice for security purposes, to protect against unapproved usage of the list, and for legal compliance with the opt-out provisions of the Federal CAN-SPAM Act of 2003⁴ for all emails sent to a rented list to include the owner of the email list in the from line of the message. For that reason, the "from" line on the Bumper Sticker Email read: "General Wes Clark [mailto: info@hillaryclinton.com]".⁵

3. The Bumper Sticker Email communication was made independently of any candidate, candidate's committee, or political party committee

Ready for Hillary PAC drafted the email communication, selected the communication date, and the list brokerage firm sent it to the rented list. Friends of Hillary did not authorize, suggest, draft, review, or edit the Bumper Sticker Email in any way before it was sent to the email list.

The paid-for-by disclaimer and the content of the communication prominently stated that the Bumper Sticker Email was from Ready for Hillary PAC. Ready for Hillary PAC's logo was at the top of the email message and the top line read: "Ready for Hillary PAC is solely responsible for the content of this message."⁶

The Bumper Sticker Email communication was not made in cooperation, consultation or concert with, or at the request or suggestion of a candidate, a candidate's authorized committee, or a political party committee.

4. Ready for Hillary PAC is not an authorized committee of any candidate

Ready for Hillary PAC has not been designated an authorized committee of any candidate. The independent expenditure only committee does not receive contributions or make expenditures on behalf of any candidate.

Former Secretary of State Clinton is not a candidate for any office and she has not authorized Ready for Hillary PAC to raise contributions or make expenditures on her behalf.

5. The Bumper Sticker Email contained the proper disclaimer

The Bumper Sticker Email contained the proper disclaimer for an email sent to more than 500 persons that was not authorized by any candidate. The disclaimer on the Bumper Sticker Email includes the Ready for Hillary PAC's full name, the World Wide Web address of Ready for Hillary PAC, and a statement that it was not authorized by any candidate or candidate's committee. It was clearly readable,

⁴ 15 U.S.C. § 7704(a)(3)(A)

⁵ See Exhibit 1, Bumper Sticker Email

⁶ See Exhibit 1, Bumper Sticker Email

printed in a box, and printed with a reasonable degree of color contrast between the background and the printed statement. The disclaimer reads: "Paid for by Ready For Hillary PAC / www.readyforhillary.com / Not Authorized by any Candidate or Candidate's Committee".

6. Stop Hillary PAC abused the Commission's complaint process.

Attorney Sirois and co-counsel Dan Backer are abusing the Commission's complaint process by making false representations of the law in a transparent attempt to generate press to raise funds for the Stop Hillary PAC. Notably, Attorney Backer also serves as treasurer of the Stop Hillary PAC.⁸

There is no support for Stop Hillary PAC's "legal" argument in FECA or Commission regulations, advisory opinions, or enforcement matters. The only apparent reason they filed this complaint was to generate press and solicit contributions for Attorney Backer's PAC.

Stop Hillary PAC's fundraising strategy started by releasing a copy of their complaint to the press before filing it with the Commission. Ready for Hillary PAC first learned of Stop Hillary PAC's complaint from a reporter from the web-based news publication BuzzFeed in an email received on the morning of January 22, 2014.⁹ Stop Hillary PAC apparently acknowledged to the reporter that they knew of the weakness of their legal argument:

The complaint alleges that even though committees may do what they wish with their contributor lists, this particular incident still violates campaign finance law because it signals, in [Stop Hillary PAC's] words, [Hillary Clinton] 'openly encouraging and supporting the activity of Ready for Hillary.' [Stop Hillary PAC] argues that this 'authorization' by Clinton makes her, in effect, a candidate, and therefore subjects her to FEC regulations.

The reporter noted that "[r]egardless of whether their allegations have merit in the eyes of the FEC, it is still being filed, so I have to ask [for comment]!" That afternoon, BuzzFeed published its story about the FEC complaint.¹⁰

Immediately after the BuzzFeed story was posted, Stop Hillary PAC continued their attempt to gain attention on Twitter. Stop Hillary PAC thanked BuzzFeed's news director in a tweet published at 3:38 p.m. EST on January 22, 2014.¹¹

⁷ See Exhibit 1, Bumper Sticker Email.

⁸ Stop Hillary PAC, FEC Form 1 Statement of Organization attached as Exhibit 3.

⁹ Email from Ruby Gramer to Seth Bringham, "FEC complaint by 'Stop Hillary'", Jan. 22, 2014, attached as Exhibit 4.

¹⁰ BuzzFeed, "Anti-Hillary Group Calls for Investigation Into Super PAC's Email List Rental," Jan. 22, 2014 attached as Exhibit 5.

Stop Hillary PAC later used the complaint as a means to drive internet traffic to their website. They tweeted: "Check out our FEC complaint [sic] we files [sic] last Wed against @HillaryClinton and @ReadyForHillary. Go to stophillaryclinton.org for more"¹² and "Help us fight #Hillary and stop her now and in 2016. We've taken her and @ReadyForHillary to the FEC. Join us at <http://stophillarypac.org>."¹³

They then used the FEC complaint to solicit contributions for Attorney Backer's PAC. One Stop Hillary PAC solicitation email compared Hillary Clinton to Al Capone breathlessly claiming:

Norma, we have just NAILED Hillary on her own technicality - multiple Federal Campaign Finance Violations. That's right. We got her. Today our lawyers hand delivered a formal complaint against Hillary Rodham Clinton detailing multiple violations classifiable as both civil and even possibly felony-related criminal violations."¹⁴

Stop Hillary PAC then got to the point of their efforts: "agree to your most generous contribution of \$100, \$50, \$25 - or even \$5 or \$10 - IMMEDIATELY."¹⁵

B. Legal Analysis

There are three legal issues in this matter: 1) did Ready for Hillary PAC rent the Friends of Hillary email list for the usual and normal charge as defined at 11 C.F.R. § 100.52(d), 2) when it rented the email list, did Ready for Hillary PAC become an "authorized committee" as defined at 2 U.S.C. §§ 431(6) pursuant to 432(e)(1), and 3) did Ready for Hillary PAC use the proper disclaimer on its communication pursuant to 2 U.S.C. § 441d; 11 C.F.R. § 110.11.

1. Ready for Hillary rented the email list for the usual and normal charge

For decades, the Commission has held that FECA permits Federal candidate committees to rent or sell their donor lists for the usual and normal charge, fair market value, to other Federal political committees. Since 1979, the Commission has issued numerous advisory opinions confirming that candidate committees may rent or sell assets of the committee, such as its donor list, if the asset was developed by the committee in the normal course of its operation, the asset was developed primarily for the committee's own use, and the price that the committee charged was the

¹¹ Stop Hillary PAC twitter, Jan. 22, 2014 at 3:38 p.m. EST attached as Exhibit 6.

¹² Stop Hillary PAC twitter, Jan. 26, 2014 attached as Exhibit 7.

¹³ Stop Hillary PAC twitter, Feb. 18, 2014 attached as Exhibit 8.

¹⁴ Stop Hillary PAC, "Is Hillary Clinton the next Al Capone?" email, Jan. 23, 2014 attached as Exhibit 9.

¹⁵ See Exhibit 9, Stop Hillary PAC solicitation email.

“usual and normal charge” for the asset under the provisions of 11 C.F.R. § 100.52(d)(2).¹⁶

Even after FECA was significantly amended by the Bipartisan Campaign Reform Act of 2002 (“BCRA”) the Commission held that Federal political committees could rent their contributor lists at the usual and normal charge in a bona fide, arms length transaction to any person, including other Federal political committees, 527 political organizations, 501(c)(3) charitable organizations, non-profit groups, for-profit corporations, and labor organizations.¹⁷

The primary issue in the FEC holdings is whether the renting or purchasing entity paid the usual and normal charge for the political committee’s list.

“Contribution” is defined in FECA and Commission regulations as “any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for Federal office.” 2 U.S.C. § 431(8)(A)(i); 11 C.F.R. § 100.52(a). Commission regulations state that “[u]nless specifically exempted ... the provision of goods ‘at a charge that is less than the usual and normal charge for such goods or services is a contribution.’” 11 C.F.R. § 100.52(d)(1). “Usual and normal charge” is defined as the price of goods in the market from which they ordinarily would have been purchased at the time of the contribution; or the commercially reasonable rate prevailing at the time the services were rendered.” 11 C.F.R. § 100.52(d)(2).

In this matter, Ready for Hillary PAC worked through a commercial list brokerage firm to rent the Friends of Hillary email list for a one-time use. In a bona fide arms length transaction, Ready for Hillary PAC paid the fair market value, usual and normal charge of \$136,841.70 for the one-time use of the email list.

Pursuant to decades of Commission holdings, former-candidate committees may rent their email lists to other Federal political committees at the usual and normal charge. Ready for Hillary PAC paid the usual and normal charge for the use of the email list. It did not make a contribution to Friends of Hillary.

¹⁶ See FEC AOs 1979-18 (when a committee sells its list for the usual and normal charge the purchaser does not make a contribution to the committee), 1979-24 (it is permissible under FECA for a former-candidate committee to sell committee assets to a non-federal committee if the purchaser pays the usual and normal charge for the asset), 1981-48 (Federal candidate committee may exchange contributor names with another political committee, non-profit organization, or corporation if the exchange is of names of equal value according to accepted industry practice), and 1981-53 (Federal candidate committee may sell its mailing list to a corporation for the usual and normal charge).

¹⁷ FEC AO 2002-14

2. Ready for Hillary PAC is not an authorized committee of a candidate

Ready for Hillary PAC did not become an "authorized committee" of a candidate when it simply rented an email list at the usual and normal charge from a former-candidate's committee.

FECA requires three pre-requisites for becoming an "authorized committee" as defined at 2 U.S.C. § 431(6). First, there must be a "candidate." 2 U.S.C. § 431(2). Second, the candidate must designate a "principal campaign committee." 2 U.S.C. § 431(5). And third, the candidate must either 1) expressly designate an "authorized committee" in writing and filed with the principal campaign committee of such candidate and the Commission or 2) "after written notification by the Commission that any other person has received contributions aggregating in excess of \$5,000 or made expenditures aggregating in excess of \$5,000 on the individual's behalf, the individual fails to disavow such activity by letter to the Commission within 30 days of receipt of the notification." 2 U.S.C. § 432(e)(1); 11 C.F.R. § 100.3(a)(3).

In the complaint, Attorney Sirois grossly misrepresented the law when she claimed:

By providing authorization to use the List, [former candidate Hillary] Clinton has in effect authorized Ready for Hillary PAC to receive contributions from her own discrete list of supporters on her behalf and on behalf of a candidacy for President, and should properly identify the committee as an authorized committee of Clinton.¹⁸

No where in FECA or in Commission regulations, advisory opinions, or enforcement matters is there any legal support for her argument that a political committee becomes an "authorized committee" of a candidate when it rents a list from a former-candidate's campaign committee.

In this matter, none of the three "authorized committee" pre-requisites actually found in FECA have been met: 1) Former-Secretary of State Clinton is not a candidate for any office; 2) while Friends of Hillary is the principal campaign committee of a former candidate it is not raising contributions or making expenditures to elect Mrs. Clinton to any office; and 3) Mrs. Clinton has not designated in writing that Ready for Hillary PAC is an authorized committee of her principal campaign committee or received any notification from the Commission asserting that Ready for Hillary PAC is an "authorized committee" and requesting a disavowal of its activities.

Furthermore, Ready for Hillary PAC is an independent-expenditure only political committee. It is not receiving contributions or making expenditures on

¹⁸ Complaint at p. 3.

behalf of any candidate. The Bumper Sticker Email did not even contain a solicitation of any funds. Ready for Hillary PAC is not making any expenditures in concert or cooperation with or at the request or suggestion of any candidate, candidate's committee, or political party committee.¹⁹ Ready for Hillary PAC is only publicly, and independently, encouraging Former-Secretary of State Clinton to run for president.

FECA requires much more than Attorney Stirois suggests in her complaint for a political committee to be designated as an authorized committee of a candidate. None of the FECA requirements for designation of an "authorized committee" have been met in this matter. There is no reason to believe that a violation of FECA occurred when Ready for Hillary PAC simply rented an email list from a former candidate's campaign committee.

3. Ready for Hillary PAC used the proper disclaimer

When a political committee makes a disbursement for an email of more than 500 substantially similar communications that is not authorized by a candidate the "disclaimer must clearly state the full name and permanent street address, telephone number, or World Wide Web address of the person who paid for the communication, and that the communication is not authorized by any candidate or candidate's committee."²⁰ The disclaimer must be "clearly readable by the recipient of the communication," "contained in a printed box set apart from the other contents of the communication," and "printed with a reasonable degree of color contrast between the background and the printed statement."²¹

The disclaimer on the Bumper Sticker Email includes the Ready for Hillary PAC's full name, the World Wide Web address of Ready for Hillary PAC, and a statement that it was not authorized by any candidate or candidate's committee. It was clearly readable, printed in a box, and printed with a reasonable degree of color contrast between the background and the printed statement. The disclaimer reads: "Paid for by Ready For Hillary PAC. / www.readyforhillary.com / Not Authorized by any Candidate or Candidate's Committee".²²

¹⁹ FEC regulations at 11 C.F.R. § 109.21 contain a three-prong test for determining coordination between a person paying for a communication and a candidate. One essential element of the Commission's coordination analysis is that there must be a candidate with whom the person paying for the communication coordinates. In this matter, that essential element is missing — Former-Secretary of State Clinton is not a candidate for any office.

²⁰ 11 C.F.R. § 110.11(b)(3).

²¹ 7 U.S.C. §§ 441d(c)(1)-(3).

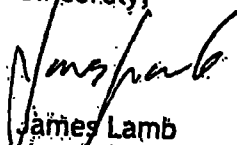
²² See Exhibit 1, Bumper Sticker Email.

III. Conclusion

Ready for Hillary PAC acted in full compliance with FECA when it rented an email list from a former candidate's campaign committee at the usual and normal charge pursuant to decades of precedent established by the Commission. Ready for Hillary PAC did not make a contribution to any candidate committee. It is not raising any contributions or making any expenditures on behalf of any candidate. Ready for Hillary PAC is not an "authorized committee" of any candidate. And the proper disclaimer was used on Ready for Hillary PAC's email communication. There is no reason to believe that Ready for Hillary violated FECA.

Attorney Sirois and Attorney Backer, who also serves as treasurer for Stop Hillary PAC, are abusing the Commission's complaint system by making false representations of the law for the apparent purpose of generating press to raise raising funds for their PAC. A legal argument based on a knowingly false representation of law constitutes dishonesty to the Commission. We respectfully request that the Commission find no reason to believe that a violation of FECA occurred, dismiss this matter, and report Christina Sirois and Dan Backer's misconduct to the Virginia State Bar Association.

Sincerely,



James Lamb
Counsel,
Ready for Hillary PAC and
Amy Wills Gray, Treasurer

Exhibit 1

Ready for Hillary PAC MUR 6775

From: General Wes Clark [mailto:info@hillaryclinton.com]
Sent: Friday, January 03, 2014 5:47 PM
Subject: Free Hillary Clinton Bumper Sticker



Please take a moment to read this special message from General Wes Clark. Ready For Hillary PAC is solely responsible for the content of this message.

Friend --

Grassroots movements happen when neighbors talk to neighbors and tell them to get involved.

One of the best ways to spark these conversations about Hillary potentially running in 2016 is by showing your support right now.

Have you picked up your free Ready for Hillary bumper sticker yet?

<https://www.readyforhillary.com/Free-Stickers>

Hillary has what it takes to be the next President of the United States. But today, as she decides whether to run she needs to see our support.

Now is the time to get our support for Hillary organized and ready for 2016.

Claim your free sticker: Proudly put your support for Hillary on display and tell your friends to do the same.

Thanks for joining with us,

General Wes Clark



CONTRIBUTE

Paid for by Ready For Hillary PAC | www.readyforhillary.com
Not Authorized by any Candidate or Candidate's Committee

This email was sent to

[Click here to unsubscribe.](#)

No virus found in this message.

Checked by AVG - www.avg.com

Version: 2014.0.4259 / Virus Database: 3658/6953 - Release Date: 12/27/13

Internal Virus Database is out of date.

Exhibit 2

Ready for Hillary PAC MUR 6775

☐ Menu

Free Ready for Hillary Bumper Sticker!

The first Ready for Hillary bumper stickers are here! And we want you to be one of the first to receive one. Please use the form on the right to enter your information and we'll send you a bumper sticker.

Ready for
Hillary
www. .com

GET YOUR STICKER!

First Name *

Last Name *

Address Line 1 *

Address Line 2

City *

State or Province *

Zip/Postal Code *

Email *

SUBMIT

**Get Ready / Latest news / Shop Now / Free Bumper Sticker! / Contact Us /
Contribute**

Ready for Hillary PAC
PO Box 7705
McLean, VA 22106

[Contact Us](#) | [Privacy Policy](#)

Paid for by Ready For Hillary PAC | www.readyforhillary.com
Not Authorized by any Candidate or Candidate's Committee

Powered by NGP VAN.

Exhibit 3

Ready for Hillary PAC MUR 6775

13044271316

FEC
FORM 1STATEMENT OF
ORGANIZATION

Office Use Only

1. NAME OF
COMMITTEE (In full)(Check If name
is changed)Example: If typing, type
over the lines.

12FE4M5

STOP HILLARY PAC

ADDRESS (number and street)

(Check If address
is changed)

717 King Street

Ste 300

Alexandria

CITY ▲

VA

STATE ▲

22314

ZIP CODE ▲

COMMITTEE'S E-MAIL ADDRESS

(Check If address
is changed)

dbacker@dbcapitolstrategies.com

Optional Second E-Mail Address

csirois@dbcapitolstrategies.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

(Check If address
is changed)

http://www.stophillarypac.org/

2. DATE

07

31

2013

3. FEC IDENTIFICATION NUMBER ►



C00544767

4. IS THIS STATEMENT



NEW (N)

OR



AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Dan Backer

Signature of Treasurer

Dan Backer

[Electronically Filed]

Date

07

31

2013

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.
ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.Office
Use
OnlyFor further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-694-1100FEC FORM 1
(Revised 06/2012)

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☐ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Candidate Party Affiliation

Office Sought:

☐

House

☐

Senate

☐

President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 8.) Its connected organization is a:
- ☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization
- ☐ Membership Organization ☐ Trade Association ☐ Cooperative
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- (f) ☒ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)
- ☐ In addition, this committee is a Lobbyist/Registrant PAC.
- ☐ In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
2.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
3.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>
4.	<input type="checkbox"/>	FEC ID number	<input type="checkbox"/>

Write or Type Committee Name

STOP HILLARY PAC**6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor**

NONE

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor**7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.**

Full Name Dan Backer

Mailing Address

717 King Street

Ste 300

Alexandria

VA

22314

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

202

210

5431

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name of Treasurer Dan Backer

Mailing Address

717 King Street

Ste 300

Alexandria

VA

22314

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number

202

210

5431

Full Name of Designated Agent Christina Sirois

Mailing Address 717 King Street
Ste 300
Alexandria VA 22314

CITY STATE ZIP CODE

Title or Position Assistant Treasurer Telephone number 202 210 5431

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.
Name of Bank, Depository, etc.

Access National Bank

Mailing Address 14006 Lee Jackson Memorial Highway
Chantilly VA 20151

CITY STATE ZIP CODE

Name of Bank, Depository, etc.

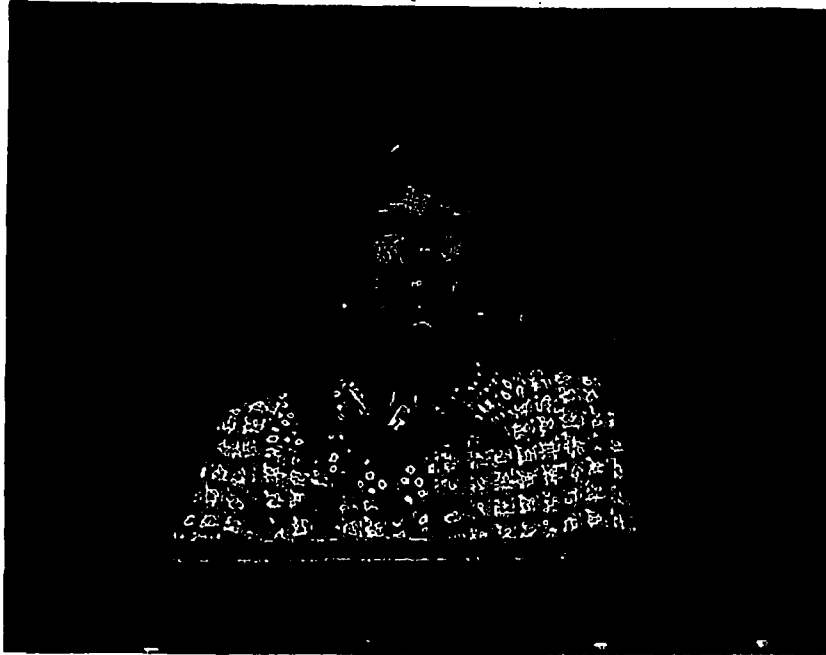
Mailing Address

CITY STATE ZIP CODE

Exhibit 5

Ready for Hillary PAC MUR 6775

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Jason Reed / Reuters

A super PAC aimed at stopping Hillary Clinton from becoming president filed a complaint with the Federal Election Committee on Wednesday against the former secretary of state and Ready for Hillary, another outside group.

Stop Hillary PAC, a group founded last summer by a team of Republican operatives, alleged in the complaint that Clinton's 2008 presidential campaign violated campaign finance law by renting its list of email addresses to Ready for Hillary.

The complaint, filed with the FEC on Wednesday afternoon, requests an "investigation into whether Clinton's authorization of the use of her list by Ready for Hillary PAC constitutes violations of federal campaign finance laws."

Ready for Hillary used the Clinton 2008 list to send an email to supporters earlier this month offering free bumper stickers. PAC spokesman Seth Bringman told Time magazine then that the group sought the list "to connect with her past supporters."

Campaign finance regulation prohibits coordination between candidates and political action committees. Clinton, of course, is not a declared candidate. Dozens of entities have rented the 2008 campaign list, including the Clinton Foundation and EMILY's List, the group dedicated to electing pro-choice women to public office.

But the anti-Clinton PAC argues in the complaint that, in authorizing the rental to Ready for Hillary, Clinton is "openly encouraging and supporting the activity" of the group — an authorization, they say, that makes Clinton a candidate "by operation of law," and therefore subjects her to campaign finance regulation.

Bringman, the spokesman for Ready for Hillary, dismissed the complaint. "They're looking for something to do, I guess," he said of Stop Hillary. "But we're focused on our nearly 2 million grassroots supporters who are ready to support Hillary Clinton should she decide to run for president."

Stop Hillary's central allegation hinges on what they characterize as Clinton's

2/27/14

Anti-Hillary Group Calls For Investigation Into Super PAC's Email List Rental

"authorization" of Ready for Hillary. A candidate, the group says, may not designate a political action committee as an authorized committee when that PAC supports more than one candidate. Ready for Hillary does focus on Clinton, but also other candidates she supports, like Virginia Gov. Terry McAuliffe.

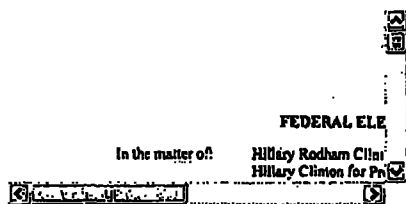
Dan Backer, Stop Hillary's lawyer, said the list rental "of course" indicates an authorization of Ready for Hillary. "What else could it be?" he said. "That violates federal election law, and we're calling on the FEC to swiftly investigate."

Any individual or group may file a complaint with the FEC.

Backer said he expects the FEC review process to take several months.

A representative for Hillary Clinton did not respond to a request to comment.

"Stop Hillary" FEC Complaint



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Exhibit 6

Ready for Hillary PAC MUR 6775

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Thanks for the article @lisatozzi
about the FEC complaint we filed
today against @HillaryClinton.
#StopHillary cc@ReadyForHillary

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1



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Exhibit 7

Ready for Hillary PAC MUR 6775

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Ready for Hillary PAC MUR 6775

11/02/2011 11:00:00



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Help us fight #hillary and stop her now and in 2016. We've taken her and @ReadyForHillary to the FEC. Join us at stophillarypac.org

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Exhibit 9

Ready for Hillary PAC MUR 6775

From: Ted Harvey, Chairman [mailto:t...@stophillarypac.com]
Sent: Thursday, January 23, 2014 2:42 PM
To: [REDACTED]
Subject: Is Hillary Clinton the next Al Capone?



[REDACTED],

What do Hillary Clinton and Al Capone have in common?

More than you might think.

Let me explain; we all know Hillary is complicit in the deaths of four Americans by leaving them to burn in Benghazi. AND she has been accused of many other illegal acts, but until now, she has not been held accountable for anything.

Well, Al Capone was a Chicago gangster responsible for smuggling, prostitution, and numerous counts of murder. And Capone, much like Hilary, was never held accountable...until federal authorities finally jailed him on a technicality -- tax evasion.

Norma, we have just NAILED Hillary on her own technicality -- multiple Federal Campaign Finance violations.

That's right. We got her.

Today our lawyers hand delivered a formal complaint against Hillary Rodham Clinton detailing multiple violations classifiable as both civil and even possibly felony-related criminal violations.

You see, recent news reports in Time Magazine, Politico and other news outlets have revealed Hillary Clintons behind-the-scenes work with unauthorized Super PACs gearing up for her 2016 presidential campaign -- all in clear violation of federal law.

The short-and-sweet of it -- Hillary Clinton conspiring with this Super PAC run by her

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longtime political henchmen is a major violation of federal election law.

Furthermore, the fact that her chosen Super PAC has raised in excess of 4 million dollars and has accepted individual contributions as high as \$25,000 in excess of the federal limits for a candidate for federal office is **ANOTHER** clear violation of the law.

Along with this full legal complaint, we're also delivering a **thick stack with tens of thousands of signatures** on our "Find Hillary Guilty Petition" directly to federal authorities.

We, with your help, are demanding a full investigation.

You have been a part of a massive outpouring of support, and just now, we've been informed we can add/append an additional 100,000 signatures to the complaint, ****if we collect them in the next 24 hours.****

Will you sign in the next 24 hours to ensure a full investigation that will surely find Hillary guilty?

I'm counting on you to sign this petition IMMEDIATELY and chip in at least \$5 to help us spread this around to more American patriots like yourself.

This is an absolutely critical and defining moment in Hillary's run for the White House...

I fear, without your help today -- just like Benghazi -- Hillary's actions will be whitewashed.

Fighting Hillary Clinton in front of the Federal Election Commission will not be cheap. But it's an **absolutely critical fight that will defeat Hillary once and for all.**

So please sign the "Find Hillary Guilty Petition" and afterwards agree to your most generous contribution of \$100, \$50, \$25 -- or even \$5 or \$10 -- IMMEDIATELY.

Thanks so much for your support.

Sincerely,

Senator Ted Harvey (R)
Colorado State Senator
Co-Founder, Stop Hillary PAC

P.S. Just like Al Capone, we might not get Hillary on the larger crimes of Benghazi, but we can bring Hillary down on campaign finance violations.

P.P.S. Hillary Clinton Found GUILTY! Just imagine the headline. With your help, we will get justice. I'm counting on you to sign today and to chip in at least \$5 to help us fight her in the legal process.

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You were added to the system [REDACTED]. For more information [REDACTED]
[REDACTED]